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BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS SUSAN W. NEEDHAM  
(OCA/USPS-T7-28-34)  
(August 1, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

Respectfully submitted,

*Gail Willette*

GAIL WILLETTE  
Director  
Office of the Consumer Advocate

*David Ruderman*

DAVID RUDERMAN  
Attorney



OCA/USPS-T7-28. Refer to your response to Presiding Officer's Information Request No. 1, question 8, and the response of witness Lion to question 9. Does the Postal Service propose that the estimated "1,839,816 of the Group II post office boxes in use [that] are located in offices which do not provide city or rural delivery service" pay the proposed Delivery Group D fees?

- a. If you answer yes, please provide the number of boxes by box size for the estimated "1,839,816 of the Group II post office boxes in use."
- b. If you answer anything other than yes, please explain.

OCA/USPS-T7-29. Refer to page 28, lines 8-9, concerning non-resident box holders.

- a. Please provide the number of non-resident box holders in towns bordering Canada and Mexico that are foreign nationals.
- b. How many box holders in border towns are US citizens who reside in both US and Canada or the US and Mexico?

OCA/USPS-T7-30. Refer to page 28, lines 8-9, concerning non-resident box holders. Are there any applicable international treaties or agreements which would prevent limiting the non-

resident box fee to foreign nationals, whether businesses or individuals? Please provide citations.

OCA/USPS-T7-31. Refer to pages 34-40 of your testimony concerning the pricing criteria of the Postal Reorganization Act.

- a. Have there been any changes in the value of service provided users of post office box service since the Postal Service requested a cost coverage of 100.8 percent for post office boxes in Docket No. R90-1? Please explain and provide documentary support, if any.
- b. Have there been any changes in "the effect of rate increases" on users of post office box service since the Postal Service requested a cost coverage of 100.8 percent for post office boxes in Docket No. R90-1? Please explain and provide documentary support, if any.
- c. Have there been any changes in the availability of alternatives for users of post office box service since the Postal Service requested a cost coverage of 100.8 percent for post office boxes in Docket No. R90-1? Please explain and provide documentary support, if any.

OCA/USPS-T7-32. Refer to pages 22-23 of your testimony concerning caller service.

- a. Please identify the types of Postal Service or other equipment that are used by caller service customers to take delivery of caller service mail.
- b. Please provide the dimensions of the Postal Service or other equipment identified in "a" above.

OCA/USPS-T7-33. Refer to pages 25-31 of your testimony concerning post office box service media attention.

- a. Has the post office box service media attention coincided with a large and rapid increase in the number of non-resident box holders? Please quantify the increase.
- b. "Over the past few years," has the increase in the number of non-resident box holders been significantly above average in comparison to other periods? Please explain. See, USPS-T-7, page 25, line 12.
- c. What are the causes of this increase in the number of non-resident box holders?

OCA/USPS-T7-34. Refer to your response to OCA/USPS-T7-10(b).

- a. Is it the position of the Postal Service that non-residents who can afford to pay the non-resident fee should be given priority over residents?

- b. Assuming the Commission recommends the proposed non-resident fee, please identify all circumstances where it will be possible for a resident on a waiting list to receive post office box service prior to a non-resident on the same waiting list, even though the non-resident was placed on the list before the resident? In your opinion, how likely is it that this would occur?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.



DAVID RUDERMAN  
Attorney

Washington, D.C. 20268-0001  
August 1, 1996